

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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ALICE KIEFT,

Plaintiff,

v.

AMERICAN EXPRESS COMPANY,
AMERICAN EXPRESS COMPANY LONG
TERM DISABILITY PLAN, and
AMERICAN EXPRESS COMPANY LIFE
INSURANCE PLAN,

Defendants.

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CIVIL ACTION NO.:

04-10949 NMG

MOTION TO ADJOURN SCHEDULING CONFERENCE

Plaintiff, by and through her undersigned counsel, respectfully moves for an order adjourning the scheduling conference in the captioned matter, which is currently scheduled for June 9, 2005, at 3:45 p.m.

As grounds for this motion, Plaintiff's counsel reports that he is currently on trial in the matter of *Palmer v. Pentucket School District*, C.A. No. 00-01352, before the Essex County Superior Court (Lawrence). The jury trial commenced yesterday, on Monday, June 6, 2005, and it is expected that the trial will continue at least through June 14, 2005. Moreover, contrary to his prior understanding, counsel learned yesterday that the trial is being conducted with full days (9 a.m.- 4 p.m.) of testimony.

Counsel for Plaintiff is a solo practitioner, and thus, has no ability to otherwise cover the scheduling conference for which he seeks adjournment.

Plaintiff has attempted to confer with opposing counsel, but on short notice, has yet received no reply as to her amenability to an assent to this motion.

Dated: Haverhill, MA
June 7, 2005

Respectfully submitted,

PLAINTIFF

By her attorney,

LAW OFFICE OF
STEPHEN L. RAYMOND, ESQ.

By: /s/ Stephen L. Raymond
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